

WEIL, GOTSHAL & MANGES LLP  
 Attorneys for the Reorganized Debtors  
 767 Fifth Avenue  
 New York, New York 10153  
 (212) 310-8000  
 Martin J. Bienenstock (MB 3001)  
 Brian S. Rosen (BR 0571)  
 Sylvia A. Mayer (Pro Hac Vice)

**UNITED STATES BANKRUPTCY COURT  
 SOUTHERN DISTRICT OF NEW YORK**

-----	X	
	:	
<b>In re</b>	:	<b>Chapter 11 Case No.</b>
	:	
<b>ENRON CREDITORS RECOVERY CORP.,</b>	:	<b>01-16034 (AJG)</b>
<b>f/k/a Enron Corp., et al.,</b>	:	
	:	<b>Jointly Administered</b>
<b>Reorganized Debtors.</b>	:	
-----	X	

**REORGANIZED DEBTORS' COUNTER-DESIGNATION OF RECORD  
 WITH RESPECT TO JPMORGAN CHASE BANK, N.A.'S STATEMENT OF ISSUES  
AND DESIGNATION OF RECORD ON APPEAL**

Enron Creditors Recovery Corp. f/k/a Enron Corp. and its affiliated reorganized debtor entities (collectively, the "Reorganized Debtors") hereby respond to the Statement of Issues and Designation of Record on Appeal filed by JPMorgan Chase Bank, N.A. (Docket No. 31197), and respectfully submit as follows:

**COUNTER-DESIGNATION OF RECORD**

The Reorganized Debtors counter-designate the following items for the record (attached hereto as Exhibits 1-2):

<b>Exhibit No.</b>	<b>Docket No.</b>	<b>Description</b>
1.	N/A	Letter from Sylvia A. Mayer to the chambers of the Honorable Arthur J. Gonzalez, dated April 3, 2007, with enclosures.

Exhibit No.	Docket No.	Description
2.	25124	Order, dated April 12, 2005, further modifying orders authorizing and approving (A) the execution, delivery and performance of (1) settlement agreement with respect to Choctaw Transactions and Zephyrus Transactions, (2) liquidation agreement with respect to Cherokee Finance V.O.F. i.1., and (3) redemption agreement with respect to Enron Finance Partners, LLC, and (B) the consummation of the transactions contemplated thereby.

Dated: New York, New York  
August 23, 2007

By: /s/ Sylvia A. Mayer  
 Martin J. Bienenstock (MB 3001)  
 Brian S. Rosen (BR 0571)  
 Sylvia A. Mayer (Pro Hac Vice)  
 Weil, Gotshal & Manges LLP  
 767 Fifth Avenue  
 New York, New York 10153  
 Telephone: (212) 310-8000  
 Facsimile: (212) 310-8007

ATTORNEYS FOR THE  
REORGANIZED DEBTORS